

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

<b>IN RE:</b> Tara Lynn Shields	)	<b>Chapter 13</b>
a/k/a Tara Grace	)	<b>Case No. 1:16-bk-04524</b>
Dean S. Shields	)	
	Debtors	)
		)
M&T Bank	)	
	Movant	)
		)
Tara Lynn Shields	)	
a/k/a Tara Grace	)	
Dean S. Shields	)	
	Respondents	)
		)
Charles DeHart, III, Trustee	)	

**DEBTORS' RESPONSE TO M&T BANK'S MOTION FOR RELIEF FROM THE  
AUTOMATIC STAY UNDER 11 U.S.C. 362 PURSUANT TO BANKRUPTCY  
PROCEDURE RULE 4001**

1. Movant, M&T Bank, filed its Motion for Relief from Stay on November 16, 2020.
2. Debtors acknowledge some mortgage payments are past due.
3. Debtors desires the opportunity to catch up on their mortgage payments.
4. Debtors requests the Court deny Movant's Motion for Relief.

WHERFORE, Debtors, Tara Lynn Shields and Dean S. Shields, prays the Court enter its order denying the Motion for Relief from the Automatic Stay that was filed November 16, 2020 by M&T Bank.

Dated: November 17, 2020

Respectfully Submitted,

/s/Stephen Wade Parker  
Stephen Wade Parker (315606)  
Counsel for Debtors  
Mooney Law  
230 York Street  
Hanover, PA 17331  
Swp@mooney4law.com  
(717) 243-4770 Phone  
(717) 632-3612 Fax